

BOARD CERTIFIED CIVIL TRIAL LAWYER ALSO ADMITTED IN VIRGINIA ALSO ADMITTED IN WASHINGTON, D.C.

March 3, 2017

VIA E-MAIL (glocks@lockslaw.com) VIA FACSIMILE (215) 893-3444

Gene Locks, Esq.
David D. Langfitt, Esq.
Locks Law Firm
The Curtis Center
Suite 720 East
601 Walnut Street
Philadelphia, PA 19106

Re: NFL Concussion Injury Litigation (Andrew Jordan, Eric Wright and Felix Wright)

Dear Counsel:

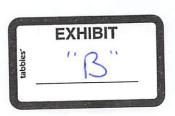
We wrote your firm on February 8, 2017, asking about your registration of Andrew Jordan. In that correspondence, we also mentioned our representation of both Eric Wright and Felix Wright. These and other players approached our group asking to be included in our prosecution of the individual player claims. Since those players became our clients, our offices, including Gibbs & Parnell, have worked closely with these players to coordinate their medical evaluation. Each has received a full battery of neuropsychological testing and specialized MRI. Among other action, these players were also seen by neurology and/or a brain injury specialist.

Of the several different firms who had previously represented our clients, these were the only three players that were registered by a prior firm. In addition, several other players who had been formerly represented by your firm were registered by our group with no problem. We felt certain your registration of these three players must have been an oversight and I called to speak about a resolution so we could register these three players.

In addition, as time grows short, we would appreciate a copy on CD of the player's file and any medical records you may have so further efforts are not duplicated. We will certainly pay for these records. Also, please let us know if you feel there is anything we should know about these players learned during the scope of your prior representation.

As is usual and customary, with the transition being complete, please provide an itemized cost statement so we can protect any reasonable costs you may have incurred related to these specific players once an award has been paid.

BANK OF AMERICA PLAZA, STE 3910
IOI EAST KENNEDY BOULEVARD
TAMPA, FLORIDA 33602-5192
T: 813.222.8222 F: 813.222.8224



Again, please have the designated person in your office call me so we can address these players as well as any other questions you may have. In the interim, we respectfully ask that your office withdraw its registration of these players so we can complete our registration and prepare to submit their claim packages. We appreciate your cooperation in this regard.

Sincerely,

Ralph L. Gonzalez, Esq.

RLG/laa

DAVID D. DICKEY
RALPH L. GONZALEZ®
HEATHER N. BARNES
C. STEVEN YERRID*+®



BOARD CERTIFIED CIVIL TRIAL LAWYER
ALSO ADMITTED IN VIRGINIA
ALSO ADMITTED IN WASHINGTON, D.C.

February 8, 2017

VIA E-MAIL (glocks@lockslaw.com), FACSIMILE (215) 893-3444 & U.S. MAIL

Gene Locks, Esq. Locks Law Firm The Curtis Center Suite 720 East 601 Walnut Street Philadelphia, PA 19106

Re: In re: NFL Concussion Injury Litigation and Mr. Andrew Jordan

Dear Mr. Locks:

It appears your firm recently registered Mr. Andrew Jordan for the claims registration that opened on February 8, 2017. As expressed earlier this morning by Mr. Parnell from Gibbs & Parnell, P.A., your registration is preventing our registration after Mr. Jordan requested the law firms in our group undertake his case. It is also our understanding Mr. Jordan provided notice he was ending your representation last year.

As further explained below, we have successfully registered other players formerly represented by your firm, so I believe this was an oversight. Please have the designated person from your group call me so that we can correct this error.

By way of history, during the last fourteen months, our office was approached by cocounsel to represent many former players in the concussion injury litigation. Many of these players were located in Central Florida and were already familiar with our firm. Mr. Jordan was one of those players. Since that time, our offices, including Gibbs & Parnell, have worked closely with these players to coordinate their medical evaluation. With regard to Mr. Jordan, he received a full battery of neuropsychological testing and he was evaluated by specialized MRI. Among other action, he was also seen by neurology and a brain injury specialist. All of this was done early last year.

As part of that process, we learned other players may have been formerly associated with your firm. As in the case of Mr. Jordan, to our understanding, these players had each communicated their intention to obtain new counsel and requested that your firm cease further efforts on their behalf. To our knowledge, none of these players were aware your firm was still exerting any efforts on their behalf. Our firm also entered a Notice of Appearance on behalf of

BANK OF AMERICA PLAZA, STE 3910 101 EAST KENNEDY BOULEVARD TAMPA, FLORIDA 33602-5192 Ti 813.222.8222 F: 813.222.8224 these players (please see the attached). Months before, Gibbs & Parnell also advised the claims administrator Mr. Jordan and these other players were being represented by our group.

So there in no further confusion, to the best of our knowledge, the players we represent that were formerly represented by your firm include: Rod Davis, Jorge Diaz, David Galloway, Ronnie Ghent, Keith Hamilton, Roland Harper, Walter Lee "Todd" Howard, Darrel Earl Jones, Andrew Jordan, Reese McCall, Ricky Nattiel, Mickey Pruitt, Mike "Jon" Reichenbach, Stacey Simmons, Clifton Smith, Jackie Walker, Eric Wright, Felix Wright, David Greenwood, Frank Hartley, and Bruce Taylor. A comprehensive list of those players and their associated cases is also attached. As noted above, we have successfully registered many of these players. That is why we believe Mr. Jordan was a simple oversight that can be easily corrected. As it would be against the instructions of Mr. Jordan, please let me know if you believe otherwise.

As is usual and customary, with the transition being complete, please provide an itemized cost statement so we can protect any reasonable costs you may have incurred related to these specific players once an award has been paid. Although we have already obtained voluminous medical records for these players, we would appreciate a copy on CD of the player's file and any medical records you may have so further efforts are not duplicated. We will certainly pay for these records. Also, please let us know if you feel there is anything we should know about these players learned during the scope of your prior representation.

Again, please have the designated person in your office call me so we can address Mr. Jordan as well as any other questions you may have. We appreciate your cooperation in this regard.

Ralph L. Gonzalez, Esq.

Enclosures RLG/kro

Player List and Associated Cases:

Rod Davis, and Jorge Diaz, Johnnie Walton, et al., v. NFL, USDC, EDPA, No. 13-cv-03125.

David Galloway, Vernon Maxwell, et al., v. National Football League [et al.], No. 2:12-cv-01023 AB.

Ronnie Ghent, Jeff Hostetler, et al., v. National Football League [et al.], No. 12-cv-2199.

Keith Hamilton, Darrel Earl Jones, Eric Wright, and David Greenwood Britt Hager, et al., v. NFL, No. USDC, EDPA, No. 12-cv-00601.

Roland Harper, and Stacey Simmons, Jeff Nixon, et al., NFL, USDC, EDPA, No. 12-cv-3352.

Walter Lee "Todd" Howard, Steve Everitt, et al., v. NFL, USDC, EDPA, No. 12-cv-007314.

Andrew Jordan, Reese McCall, and Jackie Walker, Carl Hairston, et al., v. NFL, USDC, EDPA, No. 12-cv-00989.

Ricky Nattiel, Brad Culpepper, et al., v. NFL, USDC, EDPA, No. 12-cv-2490.

Mickey Pruitt, and Frank Hartley Mark Rypien, et al., v. NFL, USDC, EDPA, No. 12-cv-1496.

Mike "Jon" Reichenbach, Steve Everitt, et al., v. NFL, USDC, EDPA, No. 12-cv-007314.

Clifton Smith, Chuck Foreman, et al., v. NFL, USDC, EDPA, No. 12-cv-04160.

Tony Smith, and Felix Wright, Alex Karras, et al., v. NFL, USDC, EDPA, No. 12-cv-1916. and

Bruce Taylor (Case: Jim Kanicki, et al., v. NFL, USDC, EDPA, No. 13-cv-00019).

UNITED STATES DISTRICT COURT EASTER DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION,

Plaintiffs,

vs.

NATIONAL FOOTBALL LEAGUE, et.al.

Defendants,

THIS DOCUMENT RELATES TO: ALL ACTIONS

No. 2:12-md-02323-AB MDL No. 2323

NOTICE OF APPEARANCE OF COUNSEL FOR SELECTED FORMER PLAYERS

Pursuant to MDL Rule 2.1 (c) and MDL No. 2323 Case Management Order No. 1 paragraph 14, the undersigned Plaintiffs' counsel hereby gives notice that The Yerrid Law Firm represents the following NFL players in this case:

- 1. Rod Davis
- 2. Jorge Diaz
- 3. David Galloway
- 4. Ronnie Ghent
- 5. Keith Hamilton
- 6. Darrel Earl Jones
- 7. Eric Wright
- 8. Roland Harper

- 9. Stacey Simmons
- 10. Walter Lee "Todd" Howard
- 11. Andrew Jordan
- 12. Reese McCall
- 13. Jackie Walker
- 14. Ricky Nattiel
- 15. Mickey Pruitt
- 16. Mike "Jon" Reichenbach
- 17. Clifton Smith
- 18. Tony Smith
- 19. Felix Wright

Their undersigned legal counsel requests that all court filings and communications regarding their claims be served upon this law firm at the addresses and telephone numbers listed below.

Dated: December _____, 2016

HEATHER N. BARNES, ESQ. C. STEVEN YERRID, ESQ.

THE YERRID LAW FIRM

101 E. Kennedy Boulevard, Suite 3910

Tampa, Florida 33602

(813) 222-8222 (telephone)

(813) 222-8224 (telefax)

hbarnes@yerridlaw.com

cjameson@yerridlaw.com

Florida Bar No. 207594

Florida Bar No. 85522

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2016 I caused the foregoing Entry of Appearance to be electronically filed with the United States District Court for the Eastern District of Pennsylvania via the Court's CM/ECF system, and that the filing is available for downloading and viewing from the electronic court filing system by counsel for all parties.

/s/ Heather N. Barnes
Heather N. Barnes, Esq.
The Yerrid Law Firm